

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

WESLEASE 2018 OPERATING LP,

Plaintiff,

vs.

Case No: 4:20-cv-00776-P

**INNOVATIVE SAND SOLUTIONS, LLC,
BULL MOOSE PIPELINE, LLC,
LINDALE PIPELINE, LLC,
DALE BEHAN, AND LINDA BEHAN,**

Defendants.

§
§
§
§
§
§
§
§
§
§
§
§

**SUPPLEMENT TO SECOND MOTION FOR ENFORCEMENT OF TURNOVER ORDER AND
SHOW CAUSE ORDER**

COMES NOW, judgment creditor Weslease 2018 Operating, LP (“Judgment Creditor” and/or “Weslease”) through undersigned counsel, and respectfully files this Supplement to its Second Motion for Enforcement of Turnover Order and Show Cause Order (the “Motion”) adverse to judgment debtors Dale Behan (“D. Behan”) and Linda Behan (“L. Behan”) (collectively the “Debtors” or the “Behans”).

Additional Facts and Evidence

Weslease has recently become aware that the Behans and their counsel have filed lawsuits—since the Turnover Order— putative on behalf of River North Farms, Inc. against Weslease. Specifically, the Behans and Sharpe have filed suit against Weslease on behalf of River North Farms, Inc. in the Tarrant County District Court for slander of title on May 10, 2024 (Case No. 048-352699-24) (*See* CNS Tarrant

County Report May 10, 2024, attached hereto as **Exhibit L**, at page 2) and in the Parker County District Court for a civil matter on May 13, 2024 (Case No. CV24-0723). *See* CNS Tarrant Court Report May 15, 2024, attached hereto as **Exhibit M**, at page 9. The Behans and their lawyer (“Sharpe”) filed these lawsuits with full knowledge of both the Turnover Order (change of control) and the Behans’ termination of authority via formal corporate action by Weslease.

These lawsuits are additional violations of the Turnover Order. They also constitute violations of Sharpe’s professional obligations.

Prayer

In addition to all relief sought, Weslease respectfully also prays the Court order Sharpe and the Behans to withdraw any and all putative litigation cases filed on the purported behalf of River North.

Respectfully submitted,

MCCATHERN, PLLC

By: /s/ Justin N. Bryan
Justin N. Bryan
State Bar No. 24072006
jbryan@mccathernlaw.com
Preston Tyson
State Bar No. 24131727
Regency Plaza
3710 Rawlins, Suite 1600
Dallas, Texas 75219
Telephone: 214.741.2662
Facsimile: 214.741.4717

ATTORNEYS FOR WESLEASE

CERTIFICATE OF CONFERENCE

On April 30, 2024, I conferred with Debtors' counsel via email regarding the content of this motion, and Debtors are opposed to the relief requested.

/s/ Justin N. Bryan
Justin N. Bryan

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2024, a true and correct copy of the foregoing was served on all counsel of record.

/s/ Justin N. Bryan
Justin N. Bryan

